

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:) Case No. 08-35653 (KRH)
)
CIRCUIT CITY STORES, INC., <i>et al.</i> ,) Chapter 11
)
Debtors.) (Jointly Administered)
)

**MOTION PURSUANT TO LOCAL BANKRUPTCY
RULE 2090-1(E)(2) FOR ADMISSION *PRO HAC VICE***

Richard E. Hagerty (“Movant”), a member in good standing of the Bar of the Commonwealth of Virginia, and an attorney admitted to practice before the United States District Court for the Eastern District of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia, hereby moves this Court for the entry of an Order permitting Stuart A. Laven, Jr., a partner with the law firm of Benesch, Friedlander, Coplan & Aronoff LLP, 200 Public Square, Suite 2300, Cleveland, Ohio 44114-2378, to appear and practice *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, on behalf of Cosmo Eastgate, Ltd., a creditor and interested party in the above-referenced bankruptcy proceeding, pursuant to Local Bankruptcy Rule 2090-1(E)(2). In support of this Motion, Movant states as follows:

1. Stuart A. Laven is a member in good standing of the Ohio State Bar and the New York State Bar, and is admitted to practice before the United States District Courts and the

Richard E. Hagerty
VSB No. 47673
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United States Bankruptcy Courts for the Northern District of Ohio, the Southern District of Ohio, the Southern District of New York, the Eastern District of New York, the Western District of New York and the Northern District of New York. There are no disciplinary proceedings pending in any court against Stuart A. Laven.

2. Mr. Laven's Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2) is attached hereto as Exhibit A and incorporated herein by reference.

3. Movant requests that this Court grant this Motion so that Stuart A. Laven, Jr. may participate, appear and be heard in matters involving Cosmo Eastgate, Ltd. in this case.

4. Pursuant to Local Bankruptcy Rule 9013-1(E), and given the administrative nature of the relief requested herein, Movant requests that the requirement that all motions be accompanied by a written memorandum of law be waived.

WHEREFORE, Movant respectfully requests that the Court enter an Order permitting Stuart A. Laven, Jr. to appear *pro hac vice* in association with Movant as counsel for Cosmo Eastgate, Ltd. in these cases; and granting such other and further relief as the Court deems just and proper.

Dated: January 10, 2013

/s/ Richard E. Hagerty
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/s/ Stuart A. Laven, Jr.
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Attorneys for Cosmo Eastgate, Ltd.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of January, 2013, I caused a copy of the foregoing to be served on the following registered persons via the Court's CM/ECF System, and on all other persons who have requested notice in these proceedings:

Lynn L. Tavenner, Esq.
Paula S. Beran, Esq.
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Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
(admitted *pro hac vice*)
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Counsel to the Liquidating Trustee

/s/ Richard E. Hagerty
Richard E. Hagerty